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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

FELIPE RUIZ, and
JOSE GABRIEL AGUIRRE,

Defendants.

CASE NO: 1:25-CR-00079-JLT-SKO

STIPULATION AND ORDER TO SET MATTER
FOR CHANGE OF PLEA, AND VACATING
STATUS CONFERENCE

THE PARTIES HEREBY STIPULATE, through their respective attorneys of record, Assistant United States Attorney Brittany M. Gunter, counsel for the government, and Maritsa A. Flaherty, counsel for defendant Felipe Ruiz, and Ashli Summer McKeivier and Marc Days, counsel for defendant Jose Gabriel Aguirre, this matter be set for a change of plea for both defendants on Monday, September 22, 2025, at 9:00 a.m. The parties further request the status conference set for Wednesday, September 17, 2025, at 1:00 p.m. be vacated. The parties likewise ask the court to endorse this stipulation by way of formal order.

The parties base this stipulation on good cause. Specifically,

1. The grand jury returned an indictment regarding this matter on April 10, 2025. ECF 28.
2. Defendants Felipe Ruiz and Jose Gabriel Aguirre are prepared to plead guilty to the Indictment. There is no plea agreement.
3. Defense counsel for both Felipe Ruiz and Jose Gabriel Aguirre are requesting this matter be

1 set for a change of plea on Monday, September 22, 2025, at 9:00 a.m. The government
2 agrees with the proposed date.

3 4. Due to the change of plea, the parties agree that the status conference on Wednesday,
4 September 17, 2025, at 1:00 p.m. can be vacated.

5 5. The government produced supplemental discovery today, on September 10, 2025.

6 6. The parties agree that time is excludable to permit defendants to enter their pleas before the
7 court.

8 7. The parties therefore stipulate that the period of time from Septmeber 17, 2025, through and
9 including September 22, 2025, is excludable pursuant to 18 U.S.C. §§ 3161(h)(7)(A) and
10 3161(h)(7)(B)(i) and (iv) because it results from a continuance granted by the Court at the
11 parties' request on the basis of the Court's finding that the ends of justice served by taking
12 such action outweigh the best interest of the public and the defendant in a speedy trial.

13 IT IS SO STIPULATED.

14 Dated: September 10, 2025

ERIC GRANT
United States Attorney

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16 By: /s/ BRITTANY M. GUNTER
BRITTANY M. GUNTER
17 Assistant United States Attorney

18
19 Dated: September 10, 2025

By: /s/ MARITSA FLAHERTY
MARITSA FLAHERTY
20 Counsel for Felipe Ruiz

21 Dated: September 10, 2025

By: /s/ ASHLI SUMMER MCKEIVIER
ASHLI SUMMER MCKEIVIER
22 Counsel for Jose Gabriel Aguirre

23
24 Dated: September 10, 2025

By: /s/ MARC DAYS
MARC DAYS
25 Counsel for Jose Gabriel Aguirre

ORDER

Pursuant to the parties' Stipulation, Defendants Felipe Ruiz and Jose Gabriel Aguirre will plead guilty to the Indictment without a signed plea agreement.

Accordingly, IT IS ORDERED that this matter be set for a change of plea for September 22, 2025, at 9:00 a.m.

IT IS FURTHER ORDERED that the status conference currently set for September 17, 2025, at 1:00 pm is vacated.

The period of time from September 17, 2025, through and including September 22, 2025, is excludable pursuant to 18 U.S.C. §§ 3161(h)(7)(A) and 3161(h)(7)(B)(i) and (iv) because it results from a continuance granted by the Court at the parties' request on the basis of the Court's finding that the ends of justice served by taking such action outweigh the best interest of the public and the defendant in a speedy trial.

IT IS SO ORDERED.

Dated: **September 12, 2025**

/s/ Sheila K. Oberto
UNITED STATES MAGISTRATE JUDGE